

FILED

9/20/2017

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

AMENDED COMPLAINT
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED

JUL 28 2017

PO

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

D'Aaron Williams

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

THOMAS J DART

Director J Mueller

Commander Belb

Superintendent Jones

Sgt. Klimek

Officer Hernandez

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

Case No: 16 CV 11540

(To be supplied by the Clerk of this Court)

CHECK ONE ONLY:

COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)

COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)

OTHER (cite statute, if known)

BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.

I. Plaintiff(s):

- A. Name: D'Aaron Williams
- B. List all aliases: _____
- C. Prisoner identification number: 2012-1019173
- D. Place of present confinement: Cook County Jail
- E. Address: P.O. Box 089002, Chicago, IL, 60608

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In A below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in B and C.)

- A. Defendant: THOMAS DART
Title: Deputy Sheriff
Place of Employment: Cook County Jail
- B. Defendant: Director J Mueller
Title: Director
Place of Employment: Cook County Jail
- C. Defendant: Superintendent Jones
Title: Superintendent
Place of Employment: Cook County Jail

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

II Defendants

D. Defendant: Commander Belb
Title: Commander
Place of Employment: Cook County Jail

E. Defendant: Sgt. Klimek
Title: Sgt.
Place of Employment: Cook County Jail

F. Defendant: Officer Hernandez
Title: Correctional Officer
Place of Employment: Cook County Jail

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: 16-cv-11540, 16-cv-11541, and
16-cv-11540 all consolidated into one.
- B. Approximate date of filing lawsuit: _____
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: _____

- D. List all defendants: _____

- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): _____
- F. Name of judge to whom case was assigned: _____
- G. Basic claim made: _____

- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): _____

- I. Approximate date of disposition: _____

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

On 8-3-16 I was informed that I'm (HRM) High risk movement and have to be escorted to court due to being classified as a member of "Savage Life" a security Threat Group, which I'm currently still being misclassified for. I submitted requests to Superintendent Jones of Div 9 and the other Superintendent of Div 10, to Gang Intel, Director J Mueller, and several others requesting that I be cleared of the inaccurate assessment of being related with this (Threat Group). but received no response ignored by Sworn Staff. Due to being misclassified as this S.T.G. Savage Life, I filed numerous Grievance complaints and had my family to call up here to address matter at hand since my pleads were being ignored which led to sworn staff retaliating against me falsely submitting Staff assaults against me In Div 9 and Div 10 by officers name unknown at this time which I was placed in segregated confinement later to be free from the falsified infractions on

each occasion. Due to being ~~the~~ label (Savage Life) my movement have been restricted. Also while being housed in segregated confinement each time for both false staff assaults infraction my property was lost and destroyed each time by sworn staff retaliating against me. I have no infraction related to or have no connection to the Security Threat Group Savage Life. In fact I was a victim myself to (Savage Life). Those individuals with multiple V.O.S Shampoo bottles filled with urine and feces attacked me and I was left in a stinky cell for hours before only given a change of pants in Div 9 Tier 2H. I informed officer Hernandez and his partner whom name unknown at this time that it was not safe for me on the Tier because of the members of Savage Life housed on Tier but I was still forced on the Tier which led to me being sprayed with feces and urine by Savage Life. These acts are being caused upon me intentionally and ~~maliciously~~ maliciously also retaliating against me which led to me being attacked by the Security Threat Group by being misclassified as one, also property lost and destroyed, and denied Law Library not allowed access to it due to movement restricted by being ~~misclassified~~ misclassified as Savage Life.

Lawsuit notes

It is conceivable that the wrongful classification of plaintiff as a "High Risk Movement" inmate could implicate a federal right if he were purposefully misclassified due to retaliatory or discriminatory motives. See, e.g., Bridges v. Gilbert, 557 F. 3d 541, 555-56 (7th Cir. 2009).

Meriwether v. Faulkner, 821 F.2d 408, 415 n.7 (7th Cir. 1987)

("[A] prison administrative decision may give rise to an equal protection claim only if the plaintiff can establish that state officials purposefully and intentionally discriminated against him.")

V. **Relief:**

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

Due to Failure To Protect, Deliberate Indifference, Negligence, Retaliation, Abuse of Authority, 1st, 8th and 14th amendments of U.S. Constitution. I'm suing each Defendant in their Individual and Official capacity in amount reasonable deem by the court and any other fees the court see's just.

VI. The plaintiff demands that the case be tried by a jury. YES NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 14 day of 7, 20 17

D'Aaron Williams
(Signature of plaintiff or plaintiffs)

D'Aaron Williams
(Print name)

2012-0811136
(I.D. Number)
Cook County Department of Correction
P.O. Box - 089002
Chicago, IL 60608
(Address)